

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

WYONIA COX,

Plaintiff,

v.

ACTION FINANCIAL SERVICES, LLC,

Defendant.

Case No. 2:20-cv-10260-GAD-DRG

Honorable Judge Gershwin A. Drain

MOTION TO EXTEND DISCOVERY DEADLINE

NOW COMES Plaintiff Wyonia Cox (“Plaintiff”), by and through her undersigned counsel, requesting that the Court enter an Order extending the deadline to complete discovery by 30 days, up to and including May 24, 2021, and in support thereof, stating as follows:

1. On September 4, 2021, the Court entered an order requiring the parties to complete fact discovery by April 24, 2021. [Dkt. 16].
2. While the parties were in the midst of completing discovery, Plaintiff’s counsel lost contact with Plaintiff.
3. Despite Plaintiff’s counsel’s repeated efforts to contact Plaintiff, Plaintiff remains unresponsive.
4. On March 24, 2021, Plaintiff’s counsel filed a motion to withdraw as counsel for Plaintiff. [Dkt. 25]. The motion is set for presentment on April 28, 2021. [Dkt. 26]
5. In an effort to preserve Plaintiff’s right to proceed pro se and complete discovery, Plaintiff’s counsel is respectfully requesting that the Court extend the discovery deadline 30 days, through May 24, 2021.

6. There is good cause to grant the relief sought herein and the relief is sought in good faith.

7. Pursuant to Local Rule 7.1(a), Plaintiff's counsel conferred with Defendant's counsel regarding the relief sought herein and Defendant has no objection to the relief sought herein.

WHEREFORE, Plaintiff respectfully requests that the Court enter an order extending the fact discovery deadline through May 24, 2021, and for any further relief this Court deems just and proper.

Dated: April 23, 2021

Respectfully submitted,

/s/ Mohammed O. Badwan
Mohammed O. Badwan, Esq.
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CERTIFICATE OF SERVICE

I, Mohammed O. Badwan, certify that on April 23, 2021, I caused the foregoing to be served upon counsel of record through operation of the Court's Case Management/Electronic Case File (CM/ECF) system.

/s/ Mohammed O. Badwan